



To: Illinois Commerce Commission

Re: Docket No. 98-0555
Ameritech Illinois Operation Support Systems Plan of Record

Date: January 21, 2000

Dear Ms. Canton:

Covad Communications Company submits these comments in response to the Ameritech Illinois OSS Plan of Record released on January 7, 2000. After reviewing SBC/Ameritech's submission, Covad is concerned that the Plan of Record does not provide sufficient detail as to how SBC and Ameritech will integrate their OSS systems and believes that these deficiencies must be addressed in the upcoming collaboratives and in a supplemental plan of record.

The Illinois Merger Conditions require that SBC/Ameritech file an Illinois Plan of Record that includes (1) an assessment of SBC's and Ameritech's existing OSS interfaces, business processes and rules, hardware and data capabilities, and security provisions; (2) the differences between the SBC and Ameritech systems; and (3) a "comprehensive" plan for developing, deploying, and integrating those OSS systems. (Illinois Merger Conditions, Condition 29.)

In its Plan of Record, SBC/Ameritech indicates that it has met all three requirements. SBC/Ameritech states that the Plan contains an analysis of the current operating environment and identifies differences in the OSS systems within the SBC operating regions. (Ameritech Illinois Plan of Record at 3.) SBC/Ameritech also states specifically that "[t]his document is designed to provide a comprehensive analysis and plan for a specific process for integrating [the Ameritech and SBC] OSS systems and to ensure that this integration process will not have an adverse impact on competition in Illinois." (Ameritech Illinois Plan of Record at 2.) In reality, SBC/Ameritech never progresses past the second requirement of the Illinois OSS Merger Conditions. Indeed, for almost twenty pages, SBC/Ameritech details the existing OSS interfaces, business processes and rules, hardware and data capabilities, as well as the differences between their respective systems. SBC/Ameritech fails, however, to address substantively the third requirement; SBC/Ameritech has not provided any "comprehensive" or detailed plan for its development of the Ameritech Illinois OSS system and its integration with the SBC systems. Instead, SBC/Ameritech presents a cursory statement of intended enhancements in three categories: pre-ordering, ordering, and provisioning. A summary of the content of each category is provided below.



Pre-Ordering

SBC/Ameritech does not outline any significant enhancements to the Present Method of Operation except for the introduction of GUI and Corba interfaces in March 2001.

Ordering

SBC/Ameritech similarly promises to introduce a GUI interface for ordering functions in March 2001. While SBC/Ameritech states that “an ordering GUI will be implementing providing the CLECs with a robust set of order submission and order management functions[,]” (Ameritech Illinois Plan of Record at 28), SBC/Ameritech fails to specify or detail what CLECs should anticipate from the new OSS system.

SBC/Ameritech’s stated improvements in the ordering process for xDSL-capable unbundled loops are equally undefined. Indeed, SBC/Ameritech states that “some modification of data field usage will be made effective in December 2000.” (Ameritech Illinois Plan of Record at 29.) SBC/Ameritech then simply notes that these “changes will be more fully described in specifications provided as part of the advance notification process.”

Provisioning

SBC/Ameritech’s provisioning enhancements are equally sparse. Other than introducing an Order Status function by March 2001, SBC/Ameritech has not committed to any significant enhancements to the present methods of operation.

Covad is deeply troubled by SBC/Ameritech’s lack of substantive OSS commitments and failure to develop or detail the few “enhancements” SBC/Ameritech has promised to implement. For example, while recognizing that the current SBC and Ameritech OSS systems are highly disparate, the Ameritech Illinois Plan of Record does not address how the systems will be reconciled in the future. Furthermore, the Future Methods of Operation makes no attempt to align Ameritech Illinois’ OSS interfaces with industry standards as defined by the Order and Billing Forum (“OBF”) and the Telecommunications Industry Forum (“TCIF”). When will the Ameritech and SBC OSS systems be integrated and when will Ameritech Illinois’ pre-ordering and ordering OSS systems be aligned with current industry standards? As it stands, Covad does not know when and where these issues will be resolved.



Covad is also troubled by SBC/Ameritech's unilateral exemption of certain functions from the Plan of Record. For example, SBC/Ameritech states that "the commitment to provide direct access to SBC's SORD, or the equivalent service order processing system in the SNET and Ameritech states, as specified, in [Paragraph] 28 of the ICC SBC/Ameritech Merger Conditions, is based on an actual CLEC request specifying the functionality desired. An assessment of this area will not be addressed in this document, but will be made following an actual CLEC request defining the scope of these projects." (Ameritech Illinois Plan of Record at 3.) With this statement, SBC/Ameritech has opted to hide from its obligations by claiming that it need not do anything until a CLEC makes a specific request for SORD. SBC/Ameritech's position is contrary to the plain language of the ICC Merger Conditions, as SBC/Ameritech itself acknowledges.

If SBC/Ameritech requires further scope definition, then the requirements gathering process should be performed in concert with the Illinois Plan of Record, not as a follow-up to the Illinois Plan of Record. In systems development, a claimed lack of understanding of requirements is a tactic often used by the systems developer to shift focus from the systems developer's inability to meet the requirement to the end-user's alleged lack of specificity. Although the tactic is commonly used in the Information Technology industry, it has no place in the Illinois Plan of Record.

SBC/Ameritech apparently justifies its cursory treatment of Illinois OSS issues by repeated passing references to the two OSS Plans of Record that SBC/Ameritech has filed with the Federal Communications Commission. It is not enough, however, for SBC/Ameritech to simply refer to its actions to comply with its federal obligations; SBC/Ameritech has independent obligations under the Illinois Merger Conditions that are intended to ensure that the merger benefits the citizens of the State of Illinois. One of these conditions requires that SBC/Ameritech file a specific OSS Plan for Illinois and discuss, in detail, how the Ameritech Illinois OSS system will be enhanced and integrated with the SBC systems. SBC/Ameritech has failed to meet that requirement. Under the Illinois Merger Conditions, Covad and other CLECs are entitled to know what SBC/Ameritech will do specifically to improve the Ameritech Illinois OSS system and how the Illinois Plan relates to the two federal Plans of Record. SBC/Ameritech should not be allowed to shirk its responsibility with passing references to the parallel FCC OSS Plans of Record for "xDSL and Advanced Services" and "Uniform and Enhanced OSS."

Covad hopes that SBC/Ameritech will rectify these deficiencies in the next step of the OSS Merger Condition process. The Illinois Merger Conditions provide that, in Phase 2 of the "Additional OSS" process, SBC/Ameritech and the CLECs will participate in a series of collaborative workshops. As an active participant in the collaboratives arising from the FCC xDSL and Advanced Services Plans of Record, Covad has significant doubts about how the collaborative for the Illinois Plan of Record will proceed. In the xDSL and Advanced Services Plan of Record Collaborative, the CLECs provided comprehensive comments on a significantly more detailed SBC/Ameritech Plan of Record; yet SBC/Ameritech summarized the CLEC comments into generalized categories and the CLEC community's comments and questions never received the



detailed responses they deserve. Given the very general nature of the Ameritech Illinois Plan of Record, Covad is concerned that it is even less likely that SBC/Ameritech will address Covad's and other CLECs' specific issues and concerns.

Nonetheless, Covad would like to request a meeting with SBC/Ameritech and the CLEC community to discuss these issues and other issues raised by CLECs in an attempt to resolve them. Covad remains hopeful that SBC/Ameritech will increase its substantive commitments and provide much-needed detail in its Illinois Plan of Record through the upcoming collaborative process and will memorialize those commitments within the next thirty days in a supplemental plan of record.

Very truly yours,

Felicia Franco-Feinberg
Regional Counsel
Covad Communications Company

cc: Samuel McClerren, Illinois Commerce Commission
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